

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 RAQUEL LAZO
5 Assistant Federal Public Defender
6 Nevada State Bar No. 8540
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Raquel_Lazo@fd.org

Attorney for Giuseppe Russo

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

GIUSEPPE RUSSO,

Defendant.

Case No. 2:17-cr-243-JCM-NJK

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United States Attorney, and Christopher Burton, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo, Assistant Federal Public Defender, counsel for Giuseppe Russo, that the Sentencing Hearing currently scheduled on October 25, 2018 at 10:30 a.m., be vacated and continued to a date and time convenient to the Court, but no sooner than forty-five (45) days.

This Stipulation is entered into for the following reasons:

1. Defense counsel has been unable to review Mr. Russo's presentence investigation report with him. Additional time is required to do so.

1 2. Additionally, defense counsel recently received two boxes of medical
2 records. Defense counsel has reviewed one box but requires additional time to review the
3 second box. This information consists of potential mitigation to be used at sentencing.

4 3. The defendant is in custody and does not oppose a continuance.

5 4. The parties agree to the continuance.

6 This is the first request for a continuance of the sentencing hearing.

7 DATED this 12th day of October, 2018.

8
9 RENE L. VALLADARES
Federal Public Defender

DAYLE ELIESON
United States Attorney

10
11 /s/ *Raquel Lazo*
By _____
12 RAQUEL LAZO
13 Assistant Federal Public Defender

/s/ *Christopher Burton*
By _____
CHRISTOPHER BURTON
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
GIUSEPPE RUSSO,
Defendant.

Case No. 2:17-cr-243-JCM-NJK

ORDER

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Thursday, October 25, 2018 at 10:30 a.m. be vacated and continued to Tuesday, December 11, 2018, at 10:00 a.m. ; or to a time and date convenient to the court.

DATED October 15, 2018.

UNITED STATES DISTRICT JUDGE